

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

VS.

MICHAEL RAMONE HOOKS

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§

Cause No: 4:23-cr-00423-1

UNOPPOSED MOTION FOR CONTINUANCE

COMES NOW, MICHAEL RAMONE HOOKS, Defendant in the above cause, by and through his attorney of record, Windi Akins Pastorini, and makes this Unopposed Motion for Continuance; and for good cause would show as follows

I.

Defendant, Michael Ramone Hooks, is charged with the offense of 18:1591 Sex Trafficking of a Minor. On August 30, 2023, the undersigned was appointed to represent this Defendant. This case is currently set for sentencing on 3/27/2025 at 2:00 PM.

II.

The undersigned counsel, Windi Akins Pastorini on the Michael Hooks case and request a continuance which is needed as the Final PSR fails to reflect the Defendant's Acceptance of Responsibility, submitted to U.S. Probation Officer Zhanelle Spikes on November 25, 2024, at 11:39 AM, for inclusion in the final PSR, which instead states, erroneously, on page 9, Paragraph 46, of the Final PSR that "no Acceptance of Responsibility has been filed."

III.

Moreover, after further research and consideration, it is the opinion of the undersigned that Objections to the Presentence Report must be filed, and additional time is needed to file and serve these objections.

I have conferred with AUSA Sherry Zack regarding this Motion, and she does not oppose the filing of Objections, nor the granting of the continuance of this matter.

IV.

This motion is not made for the purposes of delay, but rather so that justice may be done.

The failure to grant the requested continuance in this proceeding will likely deny counsel for the Defendant reasonable time necessary for the effective preparation and representation of the client, taking into account the exercise of due diligence, and could thereby result in a miscarriage of justice for the Defendant. 18 U.S.C. §3161(h)(7)(B)(i) and (iv). The Government and the Defendant agree that the interests of justice served by granting the continuance outweigh the best interests of the public and the Defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(A). The period of time resulting from this continuance is excludable for purposes of speedy trial calculation pursuant to 18 U.S.C. §3161(h)(7)(A) and (B).

WHEREFORE, PREMISES CONSIDERED, the Defendant prays that the Court grant the Defendant's Unopposed Motion for Continuance, and reschedule this matter and that all corresponding deadlines in this matter be reset to future dates

consistent with the Court's docket.

Respectfully submitted,

/s/ Windi Akins Pastorini
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Attorney for Defendant

CERTIFICATE OF CONFERENCE

I hereby certify that my office conferred with AUSA Sherry Zack, and she has indicated that she does not oppose this motion.

/s/ Windi Akins Pastorini
WINDI AKINS PASTORINI

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document was served on the Assistant United States Attorneys assigned to this case via electronic filing through the Clerk's CM/ECF system on this the 4th day of March 2025.

/s/ Windi Akins Pastorini
WINDI AKINS PASTORINI